



U.S. Department of Justice

United States Attorney  
Southern District of New York

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Jacob K. Javits Federal Building  
26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278

March 14, 2025

**BY ECF**

The Honorable Jessica G.L. Clarke  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Re: *United States v. All That Lot or Parcel of Land Located at 19 Duck Pond Lane, et al.*, 23 CV 1545 (JGLC)**

Dear Judge Clarke:

Plaintiff the United States of America (the “Government”) respectfully submits this letter to request a four-month extension of the fact discovery deadline from March 31, 2025 (Dkt. 81), to July 31, 2025, in this civil asset forfeiture matter. Counsel for Voxi Management Corp. (“Voxi”) and Medallion, Inc. (“Medallion”) joins in this request. The Government, Voxi and Medallion also request a concomitant extension of the deadlines for the post-discovery joint status letter and the case management order that are presently due on April 7 and April 16, respectively, until a date after July 31, 2025, that is convenient for the Court. *See* Dkt. 81. The parties have been working cooperatively through discovery and request this additional time in order to permit the parties to obtain any needed documents that may not have been produced thus far, to identify potential witnesses for deposition, and to conduct depositions.

The Government served Voxi and Medallion with an initial and supplemental set of special interrogatory requests pursuant to Rule G(6) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, as well as with a set of interrogatories pursuant to Federal Rule of Civil Procedure 33. Voxi and Medallion provided responses, and the Government is evaluating those responses. The Government also sent an additional interrogatory request to Voxi and Medallion on February 25, 2025.

With respect to document discovery, the Government served document requests to Voxi and Medallion, as well as third-party subpoenas seeking documents from individuals. The Government is in the process of reviewing the documents produced to date and is endeavoring to identify documents that have not yet been produced. The Government intends to meet and confer with Voxi and Medallion to determine if there are responsive documents that have not yet been produced and, if necessary, to send additional document requests or issue any needed third-party subpoenas. In addition, the Government is continuing its work producing documents in response

to the document requests issued by Voxi and Medallion. The Government produced more than 70,000 pages to Voxi and Medallion on October 5, 2023, and July 25, 2024 (that we reproduced on November 12, 2024). The Government is in the process of determining if it has additional responsive documents to produce, and will supplement its production when it concludes this review.

In addition, the Government is presently evaluating individuals that the Government may seek to depose. This is complicated by the fact that many of the witnesses in the case are overseas. The parties have each issued Rule 30(b)(6) Deposition Notices, and have started the process of meeting and conferring regarding those deposition notices.

In order to continue to develop the facts of this case through discovery as described above, the United States and claimants Voxi and Medallion thus respectfully request this extension of the fact discovery schedule through July 31, 2025. We also note that the prior lead attorney for the Government in this case left the Office late last year, and a second attorney previously on the case has been on parental leave for much of the period since the prior extension request had been approved and is now working on trial preparation for a different case scheduled for the end of this month. Accordingly, it has taken time for the attorneys presently litigating this case for the Government to get up to speed on the factual record of this matter. We further note that counsel for Voxi and Medallion will also be on trial in the case *US v Edward Vaughan et al.*, Case No. 4:22-cr-162 (E.D. Tex.), that is scheduled to start on March 31, and may last 2 to 3 weeks. This is the parties' fourth request for an extension of the fact discovery deadline.

I advised Claimants Palazzo del Marre at Fisher Island Condominium No. One Association, Inc., Palazzo del Sol/Della Luna at Fisher Island Condominium Association, Inc., Sunshine State Certificates VIII, LLLP, and Fisher Island Community Association, of this request on Wednesday, March 12, 2025, and have not received any opposition.

The Government thanks the Court for its consideration of this request.

Respectfully submitted,

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Cc: Counsel of record via ECF